

## **REMARKS/ARGUMENTS**

### **Claim amendment**

The amendment combines the features of claims 1, 2 and 3, and cancels claims 2 and 3 as redundant.

**All pending claims have been rejected under 35 USC 103 as being unpatentable over Palynchuk in view of Industrial Fluid Power by Hedges.**

Applicants respectfully traverse this rejection.

Palynchuk discloses a hydraulic system that provides power to a pair of motors, one of which pair drives one chain of a continuous chain injector and the other of which drives the other chain. Palynchuk does not disclose the control system as claimed.

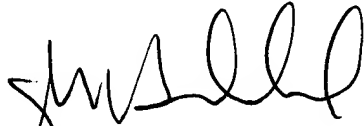
The examiner cites Industrial Fluid Power as disclosing the claimed control system.

Applicant disagrees that the combination of these references yields the claimed invention. Industrial Fluid Power states, in line 1, page 102, a portion cited by the examiner, that: "Step control involves two or more smaller hydraulic motors connected to a drive in place of one larger motor", and, lower on page 102, referring to Fig. 6-11: "Motors 1 & 2 are connected to the same load ..."

This is not the case with the claimed invention. As claimed, one hydraulic motor drives a first continuous chain, and the second hydraulic motor drives the second continuous chain. Hence, two smaller motors are not provided to a drive in place of one larger motor. The claimed invention provides an efficient and clever solution to the problem of providing control hydraulic motor speed to a continuous feed injection unit.

Further, claim 1 requires that the hydraulic supply be open loop, which allows the continuous feed injection unit to be powered by the hydraulic supply of a service rig, rather than requiring a stand alone, and therefore more expensive, hydraulic system. Reconsideration and withdrawal of the rejections, and allowance of the claims, is respectfully requested.

Applicant believes the application is in condition for allowance and respectfully requests the same. If the Examiner is of a differing opinion he/she is hereby requested to conduct a telephonic interview with the undersigned attorney.



---

Joseph W. Holland  
Reg. No. 38,919  
September 9, 2004  
(208) 336-1234